

METRO AMBULANCE SERVICES, INC. D/B/A
AMERICAN MEDICAL RESPONSE

Employer

and

INTERNATIONAL ASSOCIATION OF EMT'S
AND PARAMEDICS (IAEP)

Petitioner

10-RC-208221

For the reasons set forth below, Metro Ambulance Services, Inc. d/b/a American Medical Response (hereafter, the “Employer”) hereby moves, by and through the Undersigned Counsel, for cancellation of the hearing scheduled for December 13, 2017.

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of Organizing, and the person who, purportedly, served the Objections upon the Employer. More specifically, the hearing was scheduled to resume on December 13, 2017 in order for the Employer to question Mr. Sardad on his service of the Objections.

Yesterday, an effort was made to serve a Subpoena *Ad Testificandum* and a *Subpoena Duces Tecum* (hereafter, the “Subpoenas”) upon Mr. Sardad at 159 Burgin Parkway, Quincy, Massachusetts 02169, which is the address that appears below his signature line in, amongst other submissions to the Board, the Objections. When the Employer’s process server appeared at the above-referenced address, he was informed by individuals present at the address that Mr. Sardad did not work at the address, but instead, was based in California, and they refused to accept service of the Subpoenas.

The Employer has endeavored to reach the Petitioner’s attorney to ascertain whether Mr. Sardad intends to respond to the Subpoenas and appear at the hearing tomorrow, but has not been able to reach the Petitioner’s attorney. In addition, given the circumstances, the Employer no longer intends to seek testimony from Mr. Sardad, but rather, intends to rely, and does rely, upon the evidence received into the record thus far. More generally, the Employer preserves, without restriction or limitation, each and

every defense to the Objections and all arguments heretofore presented in the proceedings.

Based upon the reasons stated above, the Employer respectfully requests that the hearing scheduled for tomorrow be cancelled and a deadline for the submission of post-hearing briefs be set. As noted above, the Employer has not been able to reach the Petitioner's attorney, and therefore, is unable to advise as to the Petitioner's position on the request now before the Region.

Dated: December 12, 2017

Respectfully submitted,

/s/ _____

Bryan T. Carmody, Esq.
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UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 10

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CERTIFICATE OF SERVICE

The Undersigned, Bryan T. Carmody, being an Attorney duly
admitted to the practice of law, does hereby certify, pursuant to 28 U.S.C. §
1746, that, on December 12, 2017, the document above was served upon the
following *via* email:

Sara Michaels, Esq.
Attorney for the Petitioner
159 Burgin Parkway
Quincy, MA 02169
smichaels@nage.org

Dated: Glastonbury, CT
December 12, 2017

Respectfully submitted,

/s/ _____

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